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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH**

In re: SUBPOENA TO PAUL G. CASSELL

Underlying case:

VIRGINIA L. GIUFFRE, Plaintiff

v.

GHISLAINE MAXWELL, Defendant

No. 15-cv-07433-RWS (S.D.N.Y.)

**REPLY DECLARATION OF BRENT
HATCH IN SUPPORT OF MOTION TO
QUASH SUBPOENA OR, IN THE
ALTERNATIVE, FOR A PROTECTIVE
ORDER**

Case No. 2:16-mc-00602-DB-EJF

I, Brent Hatch, declare as follows:

1. I am an attorney at law duly licensed in the State of Utah and admitted to practice in the U.S. District Court for the District of Utah. I respectfully submit this reply

¹ This daytime business address is provided for identification and correspondence purposes only and is not intended to imply institutional endorsement by the University of Utah for this private representation.

declaration in support of the Motion to Quash Subpoena or, in the Alternative, for a Protective Order.

2. Attached as Exhibit 1 is a true and correct copy of the Victims' Response to Alan Dershowitz's Motion to Interview in the Southern District of Florida in the case of *Jane Does v. United States*. It is filed under seal.

3. Attached as Exhibit 2 is a true and correct copy of Edwards and Cassell's Notice of Withdrawal of Summary Judgment Motion.

4. Attached as Exhibit 3 is a true and correct copy of Motion to Exceed Presumptive Ten Deposition Limit filed in the Southern District of New York in the case of *Giuffre v. Maxwell*. It is filed under seal.

5. Attached as Exhibit 4 is a composite exhibit, which are true and correct copies of pages from the Deposition of Ghislaine Maxwell in the underlying case here. It is filed under seal.

6. Attached as Exhibit 5 is a composite exhibit, which are true and correct copies of pages from the Deposition of Rinaldo Rizzo in the underlying case here. It is filed under seal.

7. Attached as Exhibit 6 is a true and correct copy of Judge Sweet's opinion in this case on June 20, 2016. It is filed under seal.

8. Attached as Exhibit 7 is a true and correct copy of a transcript of a hearing before Judge Sweet in the underlying case on June 23, 2016.

9. Attached as Exhibit 8 is a true and correct copy an affidavit filed on January 30, 2015, by FBI Agent Slater in the Southern District of Florida in the case of *Jane Does v. United States*.

DATED this 27th day of June, 2016.

HATCH, JAMES & DODGE, PC

By: _____
Brent Hatch

CERTIFICATE OF SERVICE

I certify that on June 27, 2016, I electronically served the foregoing pleading via e-mail on:

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/s/ Brent Hatch
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